6.4 UNIT OPERATING PROCEDURES AND PROGRAMS

Specification

A. Detailed written procedures with appropriate check-off lists and instructions shall be provided for the following conditions:

1. Normal startup, operation, and shutdown of a unit, and of all systems and components involving nuclear safety of the station.

2. Calibration and testing of instruments, components, and systems involving nuclear safety of the station.

3. Actions to be taken for specific and foreseen malfunctions of systems or components including alarms, primary system leaks and abnormal reactivity changes.

4. Release of radioactive effluents.

5. Emergency conditions involving potential or actual release of radioactivity.

6. Emergency conditions involving violation of industrial security.

7. Preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

8. Refueling operations.

B. Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

H. Practice of site evacuation exercises shall be conducted annually, following emergency procedures and including a check of communications with off-site report groups.

I. ~~Deleted.~~ ADD IST PROGRAM (INSERT A)

J. Deleted. ADD TS BASES CONTROL PROGRAM (INSERT B)

K. Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

Insert A

6.4.I Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

1. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Quarterly or every 3 months	At least once per 92 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days
Every 4 years	At least once per 1461 days
Every 5 years	At least once per 1827 days
Every 8 years	At least once per 2922 days
Every 10 years	At least once per 3653 days
Once per fuel cycle (18 months)	At least once per 549 days
Every cold shutdown	Every cold shutdown
Every refueling outage	Every refueling outage

2. The provisions of TS 4.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

3. The provisions of TS 4.0.3 are applicable to inservice testing activities; and

4. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

Insert B

6.4.J Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

1. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

2. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
   a) a change in the TS incorporated in the license; or
   b) a change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

3. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

4. Proposed changes that meet the criteria of Specification 6.4.J.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

Attachment 3

Proposed Technical Specification Changes For Inservice Testing and Bases Control Program

Proposed Change

Surry Power Station Units 1 and 2
Virginia Electric and Power Company
(Dominion)

TECHNICAL SPECIFICATION
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TECHNICAL SPECIFICATION
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BASES

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during all operating conditions for which the Limiting Conditions for Operation are applicable.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

4.0.3 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when surveillance requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the surveillance requirements. This specification also clarifies that the Action Statement requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the Action Statement requirements apply from the point in time it

is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the surveillance requirement within the allowable outage time limits of the Action Statement requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B), unless it meets an exception listed therein, because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the Action Statement requirements are less than 24 hours or a shutdown is required to comply with Action Statement requirements, e.g., Specification 3.0.1, a 24 hour allowance is provided to permit a delay in implementing the Action Statement requirements. This provides an adequate time limit to complete surveillance requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with Action Statement requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This

provision also provides a time limit for the completion of surveillance requirements that become applicable as a consequence of condition changes imposed by Action Statement requirements and for completing surveillance requirements that are applicable when an exception to the requirements of Specifications 4.0.4 is allowed. If a surveillance is not completed within the 24 hour allowance, the time limits of the Action Statement requirements are applicable at that time. When a surveillance is performed within the 24 hour allowance and the surveillance requirements are not met, the time limits of the Action Statement requirements are applicable at the time that the surveillance is terminated.

Surveillance requirements do not have to be performed on inoperable equipment because the Action Statement requirements define the remedial measures that apply. However, the surveillance requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

4.0.4 This specification establishes the requirement that all applicable surveillances must be met before entry into an operational condition specified in the applicability statement. The purpose of this specification is to ensure that system and component operability requirements or parameter limits are met before entry into a condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in operational conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable surveillance requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

Exceptions to Specification 4.0.4 allow performance of surveillance requirements associated with a Limiting Condition for Operation after entry into the applicable operational condition.

When a shutdown is required to comply with Action Statement requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower condition of operation.

4.1 OPERATIONAL SAFETY REVIEW

Applicability

Applies to items directly related to safety limits and limiting conditions for operation.

Objective

To specify the minimum frequency and type of surveillance to be applied to unit equipment and conditions.

Specification

A. Calibration, testing, and checking of instrumentation channels and interlocks shall be performed as detailed in Tables 4.1-1, 4.1-A, and 4.1-2.

B. Equipment tests shall be performed as detailed in Table 4.1-2.A and as detailed below.

1. In addition to the requirements of the Inservice Testing Program, each Pressurizer PORV and block valve shall be demonstrated OPERABLE by: |

   a. Performing a complete cycle of each PORV with the reactor coolant average temperature >350°F once per 18 months.

   b. Performing a complete cycle of the solenoid air control valve and check valves on the air accumulators in the PORV control system once per 18 months.

   c. Operating each block valve through one complete cycle of travel at least once per 92 days. This surveillance is not required if the block valve is closed in accordance with 3.1.6.a, b, or c.

   d. Verifying that the pressure in the PORV backup air supply is greater than the surveillance limit at least once per 92 days.

   e. Performing functional testing and calibration of the PORV backup air supply instrumentation and alarm setpoints at least once per 18 months.

TABLE 4.1-2A
MINIMUM FREQUENCY FOR EQUIPMENT TESTS

	DESCRIPTION	TEST	FREQUENCY	FSAR SECTION REFERENCE
1.	Control Rod Assemblies	Rod drop times of all full length rods at hot conditions	Prior to reactor criticality: a. For all rods following each removal of the reactor vessel head b. For specially affected individual rods following any maintenance on or modification to the control rod drive system which could affect the drop time of those specific rods, and c. Once per 18 months	7
2.	Control Rod Assemblies	Partial movement of all rods	Quarterly	7
3.	Refueling Water Chemical Addition Tank	Functional	Once per 18 months	6
4.	Pressurizer Safety Valves	Setpoint	Per the Inservice Testing Program	4
5.	Main Steam Safety Valves	Setpoint	Per the Inservice Testing Program	10
6.	Containment Isolation Trip	* Functional	Once per 18 months	5
7.	Refueling System Interlocks	* Functional	Prior to refueling	9.12
8.	Service Water System	* Functional	Once per 18 months	9.9
9.	Deleted			
10.	Primary System Leakage	* Evaluate	Daily	4
11.	Diesel Fuel Supply	* Fuel Inventory	5 days/week	8.5
12.	Deleted			
13.	Main Steam Line Trip Valves	Functional (Full Closure)	Before each startup (TS 4.7) The provisions of Specification 4.0.4. are not applicable	10

Amendment Nos.

4.2 AUGMENTED INSPECTIONS

Applicability

Applies to inservice inspections which augment those required by ASME Section XI.

Objective

To provide the additional assurance necessary for the continued integrity of important components involved in safety and plant operation.

Specifications

A. Inspections shall be performed as specified in TS. Table 4.2-1. Nondestructive examination techniques and acceptance criteria shall be in compliance with the requirements of ASME Section XI.

B. The normal inspection interval is 10 years.

C. Detailed records of each inspection shall be maintained to allow a continuing evaluation and comparison with future inspections.

Bases

The inspection program for ASME Section XI of the ASME Boiler and Pressure Vessel Code limits its inspection to ASME Code Class 1, 2, and 3 components and supports. Certain components, under Miscellaneous Inspections in this section, were added because of no corresponding code requirement. This added requirement provides the inspection necessary to insure the continued integrity of these components.

Item 1.4

The low pressure turbine rotor blades are normally inspected concurrent with the disk and hub inspections. The disk and hub inspection frequency is based on existing crack size, crack growth rate, and system operating conditions. ASME Section XI does not provide specific examination requirements or acceptance criteria for turbine rotor inspections. Procedures and acceptance criteria for turbine rotor inspections are consistent with general industry practices.

Sensitized stainless steel augmented inspections were added to assure piping integrity of this classification.

Items 2.1.1-2.1.3

The examinations required by these items utilize the periodically updated ASME Section XI Boiler and Pressure Vessel Code for the augmented examinations. The surface and volumetric examinations required by items 2.1.1 and 2.1.2 will be conducted at three times the frequency required by the Code in an interval. In addition to the Code required pressure testing, visual examinations will be conducted, while the piping is pressurized by the procedures defined in Tables 4.1-3A & B of Technical Specification 4.1, concerning flushing of sensitized stainless steel piping. Weld selection criteria are modified from the Code for Class 1 welds, since stress level information as correlated to weld location is unavailable for Surry.

Item 2.2.1

The sensitized stainless steel located in the containment and recirculation spray rings in the overhead of containment are classified ASME Class 2 components. These components are currently exempted by ASME Section XI from surface and volumetric examination requirements. As such, an augmented program will remain in place requiring visual (VT-1) examination of these components for evidence of cracking. Additionally, sections of the piping will be examined by liquid penetrant inspection when the piping is visually inspected.

TABLE 4.2-1(continued)

SECTION B. SENSITIZED STAINLESS STEEL

Item No.	Required Examination Area	Required Examination Methods	10-Year Interval Inspection	Remarks
2.1.1	Class 1 circumferential, longitudinal, branch pipe connection, and socket welds	As required by ASME Section XI	The welds examined by volumetric or surface techniques shall be conducted at three times the frequency required by ASME Section XI	A minimum of 5% of the welds shall be examined once per 18 months. At least 75% of the total population of welds shall be examined each interval. The same welds may be selected in subsequent intervals for examination. See Note 1.
2.1.2	Class 2 circumferential, longitudinal, branch pipe connection, and socket welds	As required by ASME Section XI	The welds examined by volumetric or surface techniques shall be conducted at three times the frequency required by ASME Section XI	A minimum of 2.5% of the welds shall be examined once per 18 months. At least 22.5% of the total population of welds shall be examined each interval. The same welds may be selected in subsequent intervals for examination. See Note 1.
2.1.3	Class 1 and Class 2 sensitized stainless steel pieces	Visual (VT-2) as required by ASME Section XI	As required by ASME Section XI	In addition to the Code required examinations the affected piping shall be visually (VT-2) examined during the flushing requirements of T.S. Tables 4.1-3A and 4.1-3B.

Amendment Nos.

4.3 DELETED

4.5 SPRAY SYSTEMS TESTS

Applicability

Applies to the testing of the Spray Systems.

Objective

To verify that the Spray Systems will respond promptly and perform their design function, if required.

Specification

A. Each containment spray subsystem shall be demonstrated OPERABLE:

1. By verifying, that on recirculation flow, each containment spray pump performs satisfactorily when tested in accordance with the Inservice Testing Program.

2. By verifying that each motor-operated valve in the containment spray flow path performs satisfactorily when tested in accordance with the Inservice Testing Program.

3. By verifying each spray nozzle is unobstructed following maintenance which could cause nozzle blockage.

4. Coincident with the containment spray pump test described in Specification 4.5.A.1, by verifying that no particulate material clogs the test spray nozzles in the refueling water storage tank.

B. Each recirculation spray subsystem shall be demonstrated OPERABLE:

1. By verifying each recirculation spray pump performs satisfactorily when tested in accordance with the Inservice Testing Program.

2. By verifying that each motor-operated valve in the recirculation spray flow paths performs satisfactorily when tested in accordance with the Inservice Testing Program.

3. By verifying each spray nozzle is unobstructed following maintenance which could cause nozzle blockage.

C. Each weight-loaded check valve in the containment spray and outside containment recirculation spray subsystems shall be demonstrated OPERABLE once per 18 months by cycling the valve one complete cycle of full travel and verifying that each valve opens when the discharge line of the pump is pressurized with air and seats when a vacuum is applied.

D. A visual inspection of the containment sump and the inside containment recirculation spray pump wells and the engineered safeguards suction inlets shall be performed once per 18 months and/or after major maintenance activities in the containment. The inspection should verify that the containment sump and pump wells are free of debris that could degrade system operation and that the sump components (i.e., trash racks, screens) are properly installed and show no sign of structural distress or excessive corrosion.

4.8 AUXILIARY FEEDWATER SYSTEM

Applicability

Applies to the periodic testing requirements of the Auxiliary Feedwater System.

Objective

To verify the operability of the auxiliary feedwater pumps.

Specification

A. Tests and Frequencies

1. At least once per 31 days:

   a. Verify that the Auxiliary Feedwater System manual, power operated, and automatic valves in each flow path are in the correct position. This verification includes valves that are not locked, sealed, or otherwise secured in position, valves in the cross-connect from the opposite unit and valves in the steam supply paths to the turbine driven auxiliary feedwater pump.

2. At least once per 92 days:

   a. Verify that each motor-operated valve in the auxiliary feedwater flow paths, including the cross-connect from the opposite unit, performs satisfactorily when tested in accordance with the Inservice Testing Program. |

3. At least once per 92 days on a STAGGERED TEST BASIS:

   a. Verify that the auxiliary feedwater pumps perform satisfactorily when tested in accordance with the Inservice Testing Program. The provisions of Specification 4.0.4 are not applicable for the turbine driven pump. |

4a. Within 72 hours prior to Reactor Coolant System temperature and pressure exceeding 350°F and 450 psig, respectively, the motor driven auxiliary feedwater pumps shall be flow tested from the 110,000 gallon above ground Emergency Condensate Storage Tank to the steam generators.

4b. Within 72 hours after achieving reactor criticality, the steam turbine driven auxiliary feedwater pump shall be flow tested from the 110,000 gallon above ground Emergency Condensate Storage Tank to the steam generators. The provisions of Specification 4.0.4 are not applicable.

5. During periods of reactor shutdown with the opposite unit's Reactor Coolant System temperature and pressure greater than 350°F and 450 psig, respectively:

   a. Continue to verify that the motor driven auxiliary feedwater pumps perform satisfactorily when tested at the frequency defined in Specification 4.8.A.3.

   b. Verify that each motor-operated valve in the auxiliary feedwater cross-connect flow path for the opposite unit performs satisfactorily when tested in accordance with the Inservice Testing Program. |

B. Acceptance Criteria

The pump and valve tests, except the system flow test, shall be considered satisfactory if they meet the Inservice Testing Program acceptance criteria. |

The system flow tests during unit startup from COLD SHUTDOWN or REFUELING SHUTDOWN shall be considered satisfactory if the control board indication demonstrates that flow paths exist to each steam generator.

Basis

The correct alignment for manual, power operated, and automatic valves in the Auxiliary Feedwater System steam and water flow paths, including the cross-connect flow path, will provide assurance that the proper flow paths exist for system operation. This position check does not include: 1) valves that are locked, sealed or otherwise secured in position since they are verified to be in their correct position prior to locking, sealing or otherwise securing; 2) vent, drain or relief valves on those flow paths; and, 3) those valves that cannot be inadvertently misaligned such as check valves. This surveillance does not require any testing or valve manipulation. It involves verification that those valves capable of being mispositioned are in the correct position.

The auxiliary feedwater pump will be tested periodically in accordance with the Inservice Testing Program to demonstrate operability. The pumps are flow tested on recirculation to the 110,000 gallon Emergency Condensate Storage Tank. Valves in the flow path to the steam generators and cross-connect flow path are tested periodically in accordance with the Inservice Testing Program.

The auxiliary feedwater pumps are capable of supplying feedwater to the opposite units steam generators. For a main steam line break or fire event in the Main Steam Valve House, one of the opposite units auxiliary feedwater pumps is required to supply feedwater to mitigate the consequences of those accidents. Therefore, when considering a single failure, both motor driven auxiliary feedwater pumps are required to be OPERABLE* during shutdown to support the opposite unit if the Reactor Coolant System temperature or pressure of the opposite unit is greater than 350°F and 450 psig, respectively. Thus, to establish operability* the motor driven auxiliary feedwater pumps will continue to be tested quarterly on the same STAGGERED TEST BASIS when the unit is shutdown to support the opposite unit. The turbine driven pump is not required to be OPERABLE when the unit is shutdown and therefore, is not tested during periods of shutdown.

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* excluding automatic initiation instrumentation

2. At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume by verifying the boron concentration of the accumulator solution.

   a. This surveillance is not required when the volume increase makeup source is the RWST.

C. Each Safety Injection Subsystem shall be demonstrated OPERABLE:

1. By verifying, that on recirculation flow, each low head safety injection pump performs satisfactorily when tested in accordance with the Inservice Testing Program.

2. By verifying that each charging pump performs satisfactorily when tested in accordance with the Inservice Testing Program.

3. By verifying that each motor-operated valve in the safety injection flow path performs satisfactorily when tested in accordance with the Inservice Testing Program.

4. Prior to POWER OPERATION by:

   a. Verifying that the following motor operated valves are blocked open by de-energizing AC power to the valves motor operator and tagging the breaker in the off position:

Unit 1	Unit 2
MOV-1890C	MOV-2890C

   b. Verifying that the following motor operated valves are blocked closed by de-energizing AC power to the valves motor operator and the breaker is locked, sealed or otherwise secured in the off position:

Unit 1	Unit 2
MOV-1869A	MOV-2869A
MOV-1869B	MOV-2869B
MOV-1890A	MOV-2890A
MOV-1890B	MOV-2890B

The system tests demonstrate proper automatic operation of the Safety Injection System. A test signal is applied to initiate automatic operation action and verification is made that the components receive the safety injection signal in the proper sequence. The test may be performed with the pumps blocked from starting. The test demonstrates the operation of the valves, pump circuit breakers, and automatic circuitry.

During reactor operation, the instrumentation which is depended on to initiate safety injection is checked periodically, and the initiating circuits are tested in accordance with Specification 4.1. In addition, the active components (pumps and valves) are to be periodically tested to check the operation of the starting circuits and to verify that the pumps are in satisfactory running order. The test interval is determined in accordance with the Inservice Testing Program. The accumulators are a passive safeguard.

References

UFSAR Section 6.2, Safety Injection System

4.17 SHOCK SUPPRESSORS (SNUBBERS)

Applicability

Applies to all hydraulic and mechanical shock suppressors (snubbers) which are required to protect the Reactor Coolant System and other safety-related systems. Snubbers excluded from this inspection are those installed on non-safety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

Objective

To specify the minimum frequency and type of surveillance to be applied to the hydraulic and mechanical snubbers required to protect the Reactor Coolant System and other safety-related systems.

Specification

Each snubber shall be demonstrated OPERABLE by performing the following augmented inservice inspection program and the requirements of the Inservice Inspection Program. As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

A. Visual Inspections

1. Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.17-1. The visual inspection interval of each category of snubber shall be determined based upon the criteria provided in Table 4.17-1.

6.4 UNIT OPERATING PROCEDURES AND PROGRAMS

Specification

A. Detailed written procedures with appropriate check-off lists and instructions shall be provided for the following conditions:

1. Normal startup, operation, and shutdown of a unit, and of all systems and components involving nuclear safety of the station.

2. Calibration and testing of instruments, components, and systems involving nuclear safety of the station.

3. Actions to be taken for specific and foreseen malfunctions of systems or components including alarms, primary system leaks and abnormal reactivity changes.

4. Release of radioactive effluents.

5. Emergency conditions involving potential or actual release of radioactivity.

6. Emergency conditions involving violation of industrial security.

7. Preventive or corrective maintenance operations which would have an effect on the safety of the reactor.

8. Refueling operations.

B. Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

H. Practice of site evacuation exercises shall be conducted annually, following emergency procedures and including a check of communications with off-site report groups.

I. Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

1. Testing frequencies specified in the ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda as follows:

ASME Code for Operation and Maintenance of Nuclear Power Plants and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

2. The provisions of SR 4.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

3. The provisions of SR 4.0.3 are applicable to inservice testing activities; and

4. Nothing in the ASME Code for Operation and Maintenance of Nuclear Power Plants shall be construed to supersede the requirements of any TS.

J. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

1. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

2. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

   a. a change in the TS incorporated in the license; or

   b. a change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

3. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

4. Proposed changes that meet the criteria of Specification 6.4.J.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

K. Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

L. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital area under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

M. Deleted